UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

JOHN DOE,)
Plaintiff,))
v.	Civil Action No
THE FEDERAL REPUBLIC OF GERMANY, AND THE BUNDESKRIMINALAMT OF THE FEDERAL REPUBLIC OF GERMANY,	
Defendants.)))

SEALED DECLARATION OF JOHN DOE IN SUPPORT OF PLAINTIFF'S EX PARTE SEALED MOTION FOR LEAVE TO PROCEED ANONYMOUSLY UNDER A PSEUDONYM

I, [name redacted], declare as follows:

- 1. To protect my safety, since 2015, I have exclusively used the pseudonym "John Doe" in connection with the project now known as the Panama Papers.
 - 2. I am a United States citizen.
- 3. I believe that should my identity become known, my life would be in immediate peril. I would likely be killed.
- 4. I interpret the introduction to Russia Today's 2017 Panama Papers docudrama, described in ¶ 12 of the Complaint in this action, as an explicit and credible death threat against me by the government of the Russian Federation.
- 5. Although to the best of my knowledge the docudrama video is no longer available on YouTube, I saved it before it was removed, and was able to obtain the images embedded in the Complaint from my personal copy.
- 6. The Russian Federation has repeatedly carried out extrajudicial killings in countries around the world, and has at least attempted to do so in the United States.
 - 7. I face similar threats from the governments of China and Saudi Arabia.

- 8. I also face similar threats from international drug trafficking organizations whose companies were exposed in the Panama Papers.
- 9. I also face similar threats from ultra-high net worth individuals whose companies were exposed in the Panama Papers.
- 10. Several journalists who reported on materials from the Panama Papers have already been murdered.
- 11. I believe that other individuals, including children, would also be at serious risk of harm were my identity to become known.
- 12. If I am unable to proceed under a pseudonym, or if I am forced to disclose any identifying information, or my true signature, or create a paper trail connecting my pseudonym to a government entity via payment, I will not be able to prosecute this action.
 - 13. I am unable to have this declaration notarized for the reasons described above.
 - 14. This declaration is signed with my pseudonym for the reasons described above.

I declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct. Executed this 23st day of July, 2023.

/s/John Doe

John Doe, a pseudonym